

EXHIBIT C



U.S. Department of Justice
Criminal Division
Office of International Affairs

United States Embassy – Rome, Italy

Embassy Address:
Via Sallustiana 49
00187 Rome, Italy

U.S. Mail:
DOJ, Unit 9500, Box 23
DPO AE 09624-0023

Tel.: + 39 06 4674 2680
Fax: + 39 06 4674 2266
Email: Josh.Cavinato@usdoj.gov

August 27, 2021

BY EMAIL

Jennifer K. Welsh
International Coordinator
U.S. Attorney's Office
District of Delaware
1007 N. Orange Street, Suite 700
Wilmington, DE 19801

Re: Request from Italy for Legal Assistance in the Matter of Darkweb vendor
kaiserplug (Paxful, Inc.) (U.S. Reference Number: CRM-182-79947)

Dear AUSA Welsh:

Please find enclosed the above-referenced request from Italy for legal assistance in a foreign criminal matter. The United States is obligated to assist in such matters pursuant to the 1982 Treaty on Mutual Legal Assistance in Criminal Matters between the United States of America and Italy, as supplemented by the 2006 U.S.-Italy Mutual Legal Assistance Instrument. Consistent with the requirements of 18 U.S.C. § 3512, your office is hereby authorized to seek any requisite court orders and to take other steps necessary to execute the above-referenced request. This matter has been referred to your office for execution because the evidence requested appears to be located in your district, namely records of Paxful, Inc., located in Wilmington, Delaware.

The Facts

The facts of the case are set forth in detail in the enclosed request. Italian authorities are investigating the illegal offering for sale of vials of counterfeit Pfizer Covid-19 vaccine by darkweb vendor "kaiserplug". In March 2021, an Italian individual, Alessio Lasta, attempted to purchase the counterfeit vaccine on the darkweb by paying bitcoin through the Yarix platform. The payment was later traced to the cryptocurrency exchange Paxful, Inc, based in Wilmington, Delaware. In particular, the payment was traced to the following bitcoin address associated with Paxful, Inc.: **3QMSQtvjwvb2aFHtWRTMPaR1GTqutSW3Gd.**

Italian authorities seek records from the cryptocurrency exchange associated with that bitcoin address.

Request for Assistance

To further the investigation, Italian authorities have asked U.S. authorities to obtain pertinent records of Paxful, Inc., associated with the following bitcoin address:

3QMSQtvjwvb2aFHtWRTMPaR1GTqutSW3Gd

Paxful, Inc.'s mailing address is:

3422 Old Capitol Trail PMB# 989
Wilmington, DE 19808

According to the Delaware Secretary of State's Division of Corporations, the registered agent of Paxful, Inc. is:

Capitol Services, Inc.
1675 S. State Street, Suite B
Dover, DE 19901
Tel: 800-316-6660

Execution of Request

Based on the information provided by Italian authorities, the AUSA to whom this request is assigned may have to compel the entity to produce the records. If so, the AUSA should file an application in the U.S. District Court seeking an order, pursuant to 18 U.S.C. § 3512, appointing him/her to serve as a commissioner. If the court grants the application, the AUSA should serve a "commissioner subpoena" compelling the entity to produce the records. I have enclosed a sample 18 U.S.C. § 3512 application (and related forms), which includes the appropriate treaty citations, for your convenience.

Alternatively, if the entity agrees to produce the records on a voluntary basis, the AUSA does not have to file a commissioner's application and should schedule a date and time for the entity to do so.

Coordination with OIA

Please provide me with the name and telephone number of the AUSA to whom this request is assigned and ask him or her to analyze the request and notify me immediately if it contains insufficient information to permit execution or there are special considerations that will result in limited or delayed execution of the request. For example, if execution would result in harm to a U.S. investigation or prosecution or compromise a confidential source, assistance can be delayed or conditions on use can be imposed. If such considerations arise with respect to this request, please contact me as soon as possible to discuss available options.

Please keep this office apprised of the progress made in executing this request. I will serve as the main point of contact for both your office and Italy. Please do not hesitate to contact me at +1 202-258-4420 or Josh.Cavinato@usdoj.gov and International Affairs Specialist Katarina Lawergren at +39 06-4674-2680 or Katarina.Lawergren@usdoj.gov if you have any questions.

The Office of International Affairs and law enforcement authorities in Italy appreciate your assistance in this international criminal matter.

Sincerely,

Vaughn A. Ary
Director
Office of International Affairs

By:



Josh Cavinato
Department of Justice Attaché

Enclosures:

- Mutual Legal Assistance Request
- 3512 Application
- Treaty

cc: Miranda Keith, USAO/DE